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2 The Honorable John H. Chun
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**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE**

8 STATE OF WASHINGTON, et al.,
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Plaintiffs,

v.

10 DONALD TRUMP, et al.,
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Defendants.

12 NO. 2:25-cv-00602
13

UNOPPOSED MOTION FOR
LEAVE TO FILE BRIEF OF *AMICI
CURIAE* LOCAL ELECTIONS
OFFICIALS IN SUPPORT OF
PLAINTIFFS' MOTION FOR
PARTIAL SUMMARY
JUDGMENT

14 Noting Date: June 5, 2025
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1 Proposed *Amici Curiae* Local Elections Officials move for leave to file an amicus brief in
 2 support of Plaintiffs' motion for partial summary judgment. In furtherance of the motion, Proposed
 3 *Amici* state as follows:

4 1. Proposed *Amici* are local governments and local government officials representing
 5 33 jurisdictions.

6 2. They support Plaintiffs because they will also be harmed by the Executive Order
 7 that is the subject of Plaintiffs' lawsuit.

8 3. This Court "ha[s] broad discretion to admit amicus briefing [. . .] to assist a case
 9 of general public interest." *Sec. & Exch. Comm'n v. Bittrex Inc.*, No. 2:23-CV-00580-RSM, 2023
 10 WL 4866373, at *1 (W.D. Wash. July 31, 2023) (granting leave to file where brief provides
 11 "assistance in framing the facts and law of this case").

12 4. The proposed brief will assist the Court in its consideration of the pending motion,
 13 because local elections officials face immediate harms from the Executive Order that overlap
 14 with, yet are distinct from, the harms individuals, organizations, and states must confront.

15 5. The Executive Order would impose significant administrative burdens on Proposed
 16 *Amici* Local Elections Officials. If implemented, local election officials nationwide would be
 17 required to unlawfully and drastically amend their existing voter registration procedures and
 18 election administration procedures in violation of the U.S. Constitution and federal statutes.

19 6. The Executive Order's directed changes to election administration would
 20 exacerbate Proposed *Amici*'s existing tremendous budget and staffing constraints. Its attempt to
 21 amend the existing federal voter registration forms to require documentary proof of citizenship is
 22 not only impractical but would further burden Proposed *Amici*'s efforts to register voters. The
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Executive Order also seeks to unlawfully override existing state law determining ballot receipt deadlines and replacing existing federal guidelines on voting systems. The Executive Order thus creates an unprecedented amount of chaos and administrative hurdles that will ultimately make voting more difficult for all citizens.

7. Counsel for proposed *amici* have conferred with counsel for the parties. Plaintiffs and Defendants both consent to the request for leave to file.

8. A true and correct copy of the proposed brief has been submitted with this motion.

CONCLUSION

For the foregoing reasons, Proposed *Amici* Local Elections Officials respectfully request the Court grant the motion for leave to file the attached brief.

Respectfully submitted,

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Dated: June 5, 2025